

Dear FCC: The report of the panel is impressive. I would like to suggest the Commission act on some of those issues. I address them in the order they were presented, in the NPRM and the panel report itself.

--FIRST

[Panel:]

that telecommunications infrastructure providers should be afforded emergency responder status under the Stafford Act ...

...the Independent Panel also recommends that the emergency responder designation include all types of communications services.

[Response]

Please consider extending this aegis to licensed amateur radio operators who are similarly responding to a declared disaster area at the response or direction of a recognized NVOAD formally involved in the disaster operations. Amateur radio operators are sometimes dispatched to the most remote positions, with the least support. Extending the benefits of the Stafford Act to them is not a lot to ask.

--SECOND

[Panel:]

"...more than 2,000 police, fire and emergency medical service personnel were forced to communicate in single channel mode, radio-to-radio, utilizing only three mutual aid frequencies. Communications assets that could have been used to fill gaps were apparently not requested or deployed in sufficient quantities to have a significant impact."

[Response]

Among the assets that were available but ignored, or even refused, were trained pools of amateur radio operators practiced in emergency communications and deploying tactical networks for exactly these situations. The ARRL ARES groups (and others) are capable of deploying a complete tactical network, using fully portable VHF and UHF equipment, complete with network control operators and shadows (field radio operators) such that an ARES group can provide complete replacement for a disabled urban police or fire radio network, with multi-channel

agility, interagency operability, and good capacity. These groups can be deployed with a phone call, if someone preplans and arranges a liaison to ARRL ARES or directly to their local ARES groups.

Please consider working with ARRL to generate standard NIMS/ICS resource typing and a way to call up these assets, which were largely ignored during Katrina, and sometimes even turned back from destinations where they were needed.

--THIRD

[Panel:]

"Pre-positioning for FCC Regulatory Requirements =96 An A Priori Program for Disaster Areas. The FCC should explore amending its rules to permit automatic grants of certain types of waivers or special temporary authority (STA) in a particular geographic area if the President declares that area to be a "disaster area".

[Response]

Under Part 97 sub 401, licensed amateur radio operators are given vague direction and discretion for emergency operations. I suggest that the FCC examine and extend this section to clarify the issues of what the FCC will recognize as an emergency, without placing constraints upon the broader issue, i.e. by making specific inclusion for a formally declared emergency and making specific inclusion for what types of special authority will be sanctioned without question during those times and conditions, especially regarding how or what notification or communication should be attempted with the FCC, and what extra privileges and operations can be automatically sanctioned. For instance, allowing HF operations as needed by lower level licensees.

--FOURTH

{Panel:]

"In general, cellular/PCS base stations were not destroyed by Katrina,... the majority of the adverse effects and outages encountered by wireless providers were due to a lack of commercial power or a lack of transport connectivity to the wireless switch (wireline T1 line lost

or fixed microwave backhaul offline). ... However, within one week after Katrina, approximately 80 percent of wireless cell sites were up and running."

{Response]

I would suggest providing explicit incentives, encouragement, and regulatory requirements together to provide a "carrot and stick" set of incentives to wireless carriers. They should be encouraged and rewarded for investing in hardening their sites, installing backup power, installing emergency power generation facilities, and taking other actions that are designed to provide both the extra capacity and ability to keep the sites operating during emergencies, and bring them back to operation quickly after a failure.

In this regard, many carriers simply do not have the ability to handle high call volumes in an emergency. They should be encouraged to provide that capacity, which means extra expenses from what will normally be excess and idle capacity on their equipment. Incentives and regulations can make this "bad" business practice (excess unused capacity) worth their while.

--FIFTH

[Panel]

" Additionally, public safety officials reminded the Panel that users must be properly trained before they can be expected to competently use technologies during high stress events. "

[and]

"Mobile satellite operators reported large increases in satellite traffic without any particular network/infrastructure issues. More than 20,000 satellite phones were deployed to the Gulf Coast region in the days following Katrina. Broadband capacity was provided by fixed satellite operators for voice, video and data network applications. Nevertheless, there were functionality issues with satellite communications =96 largely due to lack of user training and equipment preparation...Users who had not been trained or used a satellite phone prior to Katrina reported frustration and difficulty in rapid and effective use of these devices."

[Response]

As I mentioned in my third point above, there are trained communications personnel willing and able to address this issue. Drop shipping "black box" technology like satellite phones is a false economy. Dispatching trained emergency communications volunteers who are familiar with the technologies and the issues would solve this problem. Adoption of formal NIMS/ICS resource typing and a liaison to the ARRL with the goal of national standards for "volunteer emergency communications" personnel and a one-step call-up process could resolve this problem. I do not believe there is any reliable way to drop ship "technology" without dispatching suitably trained operators with it. Amateur radio can provide those trained operators.

--SIXTH

[Panel:]

"Amateur Radio Service. ...Amateurs provided wireless communications in many locations where there was no other means of communicating and also provided other technical aid to the communities affected by Katrina."

[Response]

Amateur radio operators are hindered by the current lack of provision and organization to take advantage of them as a resource. As the panel has mentioned, credentialing and security problems hampered all types of responders. Amateur radio operators are especially stricken by these problems, as there are currently no recognized standard for credentialing, no standards for resource typing, no standards for training, etc. I urge the FCC to work with the ARRL on a program of standard resource typing, nationally issued credentials and background checks that will satisfy FEMA requirements, and a system of making formal and uniform use of the resource of amateur radio. In order to make this work, I suggest that formal provision will need to be made either within FEMA or within another federally funded and operated agency to provide the necessary organizational resources and management, beyond what the ARRL is able to provide.

Please make sure that some type of advance credentialing and identification is available to amateur radio operators, not just for commercial telecommunications workers, so they are able to respond to

disasters in a timely manner.

--SEVENTH

[Panel:]

The federal government, through the NCS, has established several programs for priority communications

...=93GETS=94.....=93WPS"... "TSP=94...these priority services seemed to work well for those who subscribed to them. ...only a small percentage...[subscribed].

[Response]

The same must be said, again, for amateur radio. The resource has been made available, but potential users either do not, choose not, or have not taken advantage of it. The FCC has provided for the RACES service, but in such vague terms that it often is not implemented. Perhaps the role of RACES "versus" amateur radio in disaster operations could be re-examined in the modern context, and better integrated and implemented.

--IN CONCLUSION

It would be simple to ignore the future role of amateur radio as obsoleted by hardened cellular communications and widespread training in communications hardware for the general population of emergency responders and workers. The current state of amateur radio emergency response is, at best, somewhat unorganized and certainly not integrated into NIMS/ICS as yet. But I believe that some attention to standardizing and organizing amateur radio resources would provide an extremely flexible, cost-effective, and locally pre-deployed communications resource that could be supplied for any disaster response, with the least cost and with the least training burden on all the first responder who already have enough other duties on their hands. The amateur radio community has shown it is willing and able to respond. Please take this opportunity to provide the aid and structure that is necessary to make use of this resource.

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